

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division

|                                 |                          |
|---------------------------------|--------------------------|
| In re:                          |                          |
| LeClairRyan, PLLC, <sup>1</sup> | Case No.<br>19-34574-KRH |
| Debtor                          | Chapter<br>7             |

**NOTICE OF MOTION AND HEARING THEREON**

PLEASE TAKE NOTICE Lynn L. Tavenner, Trustee, and not individually but solely in her capacity as the Chapter 7 trustee of the bankruptcy estate of LeClairRyan PLLC, in the above-referenced Chapter 7 case (the “**Case**”), by counsel, filed her *Motion for an Order Establishing Procedures for the Sale of Miscellaneous Assets and Memorandum in Support Thereof* (the “**Motion**”). A Copy of the Motion is being served herewith.

**PLEASE TAKE FURTHER NOTICE that your rights may be affected. You should read the Motion carefully and discuss it with your attorney, if you have one in this chapter 11 Case. (If you do not have an attorney, you may wish to consult one).**

**PLEASE TAKE FURTHER NOTICE** on September 4, 2019, the Court entered the *Order Establishing Certain Notice, Case Management and Administrative Procedures* [ECF. No. 38] (the “**Case Management Order**”), which approved the Notice, Case Management, and Administrative Procedures attached as Exhibit 1 to the Case Management Order (the “**Case Management Procedures**”). The Case Management Procedures, among other things, prescribe the manner in which Objections must be filed and served and set forth when certain hearings will be conducted. A copy of the Case Management Order may be obtained, free of charge, by written to request to [dtabakin@tb-lawfirm.com](mailto:dtabakin@tb-lawfirm.com) or, for a fee, at <https://ecf.vaeb.uscourts.gov>.

**PLEASE TAKE FURTHER NOTICE** if you do not want the Court to grant the relief requested in the Motion, or if you want the Court to consider your views on the Motion, then, by

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<sup>1</sup> The principal address of the Debtor as of the petition date was 4405 Cox Road, Glen Allen, Virginia 23060, and the last four digits of the Debtor’s federal tax identification number are 2451.

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**December 12, 2019** (the “**Objection Deadline**”), you or your attorney must:

File with the Court, either electronically or at the address shown below, a written response to the Motion pursuant to Rule 9013-1(H) of the Local Rules of the United States Bankruptcy Court for the Eastern District of Virginia and the Case Management Procedures. If you mail your written response to the Court for filing, you must mail it early enough so the Court will **receive** it on or before the Objection Deadline.

**If a response is not properly and timely filed and served, the Court may deem any opposition waived, treat the Motion as conceded and enter an appropriate order granting the requested relief without further notice or hearing.**

Clerk of the Court  
United States Bankruptcy Court  
701 East Broad Street, Suite 4000  
Richmond, VA 23219

In accordance with the Case Management Procedures, you must also serve a copy of your written Objection on the Core Parties, the 2002 List Parties and any Affected Entity so that the Objection is received on or before the Objection Deadline.

**PLEASE TAKE FURTHER NOTICE THAT** the Court will entertain the Motion on December 19, 2019, at 1:00 p.m. (or such time thereafter as the matter may be heard). In connection with the same, the undersigned will appear before The Honorable Kevin R. Huennekens, United States Bankruptcy Judge, in Room 5000, of the United States Courthouse, 701 E. Broad Street Richmond, Virginia 23219. Any party desiring to object or otherwise be heard with respect to the same shall also appear and be heard at such time.

**PLEASE TAKE FURTHER NOTICE THAT** you should consult the Case Management Procedures before filing any written response.

**PLEASE GOVERN YOURSELVES ACCORDINGLY.**

Respectfully submitted,

LYNN L. TAVENNER, CHAPTER 7 TRUSTEE

Dated: November 26, 2019  
Richmond, Virginia

By: /s/ Paula S. Beran  
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*Counsel for Lynn L. Tavenner, Chapter 7 Trustee*

**CERTIFICATE OF SERVICE**

Pursuant to the Local Rules of this Court, I certify that on this 26th day of November 2019, a true copy of the foregoing Motion was sent electronically and/or by first-class mail to: (a) the Office of the United States Trustee; (b) the Debtor's 20 Largest Unsecured Creditors; (c) all known secured creditors from the Debtor's Official Form 106D; (d) the Core Parties and 2002 List as defined in the Case Management Order; and (e) all parties requesting service of pleadings in this Case (as indicated on the Schedule A attached to the Court filed copy of this Notice).

/s/ Paula S. Beran  
*Counsel for Lynn L. Tavenner, Chapter 7 Trustee*

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